

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

----- x
WTC CAPTIVE INSURANCE COMPANY, INC., :
: Plaintiff, :
: v. :
: LIBERTY MUTUAL FIRE INSURANCE :
COMPANY; CERTAIN UNDERWRITERS AT :
LLOYD'S, LONDON, AND CERTAIN LONDON :
MARKET INSURANCE COMPANIES; :
ASSICURAZIONI GENERALI S.P.A.; and :
GENERAL SECURITY INDEMNITY :
COMPANY OF ARIZONA, as attorney in fact for :
and successor in interest to GENERAL SECURITY :
INDEMNITY COMPANY (now known as :
HUDSON SPECIALTY INSURANCE :
COMPANY), :
: Defendants. :
----- x

Civil Action No.: 07 Civ. 1209

District Judge Alvin K. Hellerstein

Magistrate Judge Theodore H. Katz

**DECLARATION OF
SALLY DUNNING**

In accordance with 28 U.S.C. § 1746, I, Sally Dunning, declare under penalty of perjury under the laws of the United States of America that the following statements are true and correct:

1. I am a member of the Distribution Team of Lloyd's Market Services located in Chatham, United Kingdom. In that capacity, I regularly maintain the information files of and perform administrative functions for Lloyd's members. My responsibilities include having access to the addresses of the members subscribing to each Lloyd's Syndicate. I submit this declaration in support of the motion to address jurisdiction made by Defendants Certain Underwriters at Lloyd's London, Certain London Market Insurance Companies and other defendants.

2. In March 2007, I reviewed the residency information of each subscribing member of Lloyd's Syndicates 102, 376, 609, 623, 1003, 1225, 1861, 2003, 2020, and 2488 for the 2001 year of account.

3. My review indicated that as of February 2007, Lloyd's Syndicates 609, 623, 1003, 2020, and 2488 included subscribing individual members residing in the State of New York.

4. Specifically, Syndicate 609 had 13 subscribing individual members residing in the state of New York in February 2007; Syndicate 623, 13 members; Syndicate 1003, 9 members; Syndicate 2020, 16 members; and Syndicate 2488, 9 members. (Some of these members participate on more than one of these syndicates and they are included in the numbers for each of the syndicates in which they participate).

Dated: Chatham, United Kingdom
November 21st, 2007



Sally Dunning